

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

|   |  |                                   |
|---|--|-----------------------------------|
| <b>W.P.V., on his own behalf and on behalf of<br/>his minor child, W.P.O.</b> | §<br>§<br>§<br>§<br>§<br>§<br>§<br>§<br>§<br>§ | <b>Case No. 3:23-CV-00074-DCG</b> |
| <b>Plaintiffs,</b>  |  |                                   |
| <b>v.</b>   |  |                                   |
| <b>United States of America,</b>  |  |                                   |
| <b>Defendant.</b>   |  |                                   |

**NOTICE OF SETTLEMENT**

NOTICE IS HEREBY GIVEN that the parties have reached a conditional settlement in this matter. The parties will file a stipulated agreement and, upon completion of all necessary prerequisites, a motion to dismiss this case with prejudice. Because this settlement will require Court approval as to the settlement for the claims of minor W.P.O., the parties will separately move the Court for approval of the settlement.

The parties respectfully request that the Court stay all case management deadlines pending resolution of this matter.

RESPECTFULLY SUBMITTED this 6th day of August, 2024.

Respectfully submitted,

Dated: August 6, 2024

BRANDON B. BROWN  
UNITED STATES ATTORNEY

By: /s/ Allison C. Reppond  
ALLISON C. REPPOND (TX#24085733)  
Assistant United States Attorney  
300 Fannin Street, Suite 3201  
Shreveport, Louisiana 71101-3068  
(318) 676-3600 // Fax: (318) 676-3642  
[allison.reppond@usdoj.gov](mailto:allison.reppond@usdoj.gov)  
*Attorneys for Defendant*

AND

**FISH & RICHARDSON P.C.**

/s/ Karan Jhurani (with permission)

Dated: August 6, 2024

**KARAN JHURANI** (Admitted *pro hac vice*)

Email: [jhurani@fr.com](mailto:jhurani@fr.com)

GA Bar No. 290326

Fish & Richardson P.C.

1180 Peachtree Street NE, 21st floor

Atlanta, GA 30309

Telephone: (404) 892-5005

Facsimile: (404) 892-5002

**CAITLIN M. DEAN** (Admitted *pro hac vice*)

TX Bar No. 24109797

Email: [cdean@fr.com](mailto:cdean@fr.com)

Fish & Richardson P.C.

7 Times Square, 20th floor

New York, NY 10036

Telephone: (212) 765-5070

Facsimile: (212) 2582291

**BENJAMIN C. ELACQUA**

TX Bar No. 24055443

Email: [elacqua@fr.com](mailto:elacqua@fr.com)

Fish & Richardson P.C.

909 Fannin St., Ste. 2100

Houston, TX 77010

Telephone: (713) 654-5300

Facsimile: (713) 652-0109

*Attorneys for Plaintiffs*